

**IN THE UNITED STATES DISTRICT COURT
FOR EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION**

LISA FLOWERS, *on behalf of herself
and those similarly situated*

Plaintiff,

V.

Case No. 4:23-cv-01079-RLW

SA HOSPITAL ACQUISITION GROUP,
LLC, D/B/A SOUTH CITY HOSPITAL

Defendant.

CERTIFICATE OF CONFERENCE

TO THE HONORABLE JUDGE WHITE

Brian W. Hockett, Thomas E. Reddin, and Hannah R. Lustman-Rodriguez of Thompson Coburn LLP (“Defendant’s Counsel”) filed a Motion to Withdraw their appearances in the above-captioned case on this date, April 30, 2024. Prior to filing the Motion to Withdraw (the “Motion”) on April 30, Defendant’s Counsel met with counsel for Plaintiff, Michael Iadevaia, via video teleconference to discuss the Motion, the relief requested therein, and whether Plaintiff would oppose the request by Defendant’s Counsel to withdraw their appearances and that Defendant SA Hospital Acquisition Group, LLC, D/B/A South City Hospital (the “Hospital”) receive sixty (60) additional days to respond to outstanding discovery requests. During the conference described herein, Plaintiff’s counsel requested an opportunity to review a draft version of the Motion to evaluate further whether the Motion would be opposed. Plaintiff’s counsel also requested additional information concerning representation of the Hospital moving forward. A draft version of the Motion and this Certificate was provided to Plaintiff’s counsel prior to filing.

Certified to on this 30th day of April, 2024.

Respectfully submitted,

THOMPSON COBURN LLP

By /s/ Hannah R. Lustman-Rodriguez

Brian W. Hockett, MO52984

Thomas E. Reddin, TX16660950*

Hannah R. Lustman-Rodriguez, MO72909

Thompson Coburn LLP

One US Bank Plaza

St. Louis, Missouri 63101-1611

Telephone: 314.552.6068

Facsimile: 314.552.7000

bhockett@thompsoncoburn.com

treddin@thompsoncoburn.com

hlustman-rodriguez@thompsoncoburn.com

*Attorneys for Defendant SA Hospital
Acquisition Group, LLC, d/b/a South City
Hospital through court appointed general
receiver, MorrisAnderson & Associates, Ltd.*

* Admitted *Pro Hac Vice*

CERTIFICATE OF SERVICE

The undersigned certifies that on this 30th day of April 2024, the foregoing was sent by electronic mail or U.S. Mail to the following:

John Garvey
STRANCH JENNINGS & GARVEY, PLLC
701 Market Street, Suite 1510
St. Louis, MO 63101
Tel: (314) 390-6750
Fax: (314) 255-5419

Via electronic mail:
jgarvey@stranchlaw.com

SA Hospital Acquisition Group, LLC
16192 COASTAL HIGHWAY
LEWES, DE 19958

SA Hospital Acquisition Group, LLC
c/o Jeffrey Ahlholm, Managing Member
4308 Via Entrada
Newbury Park, CA 91320

Via electronic mail:
jeff@agracapital.com

SA Hospital Acquisition Group, LLC
c/o MorrisAnderson & Associates, LLC, Gen.
Receiver
Attn: Daniel Wiggins
55 W Monroe St #2350
Chicago, IL 60603

Via electronic mail:
dwiggins@morrisanderson.com

J. Gerard Stranch, IV
Michael C. Iadevaia
STRANCH JENNINGS & GARVEY, PLLC
233 Rosa Parks Avenue, Suite 200
Nashville, TN 37203
Tel: (615) 254-8801
Fax: (615) 255-5419

Via electronic mail:
gstranch@stranchlaw.com
miadevaia@stranchlaw.com

SA Hospital Acquisition Group, LLC
c/o A Registered Agent, Inc., Reg. Agent
8 The Green, Suite A
Dover, DE 19901

SA Hospital Acquisition Group, LLC
c/o Lawrence Feigen, Managing Member
703 Park Lane
Cedarhurst, NY 11516

Via electronic mail:
larry@yesinvestllc.com

/s/ Hannah R. Lustman-Rodriguez